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September 15, 2020

Elizabeth A. Rolando, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

In Re: Illinois Commerce Commission Docket 20-NOI-02
Notice of Inquiry Regarding Electric and Natural Gas Service
Safety and Reliability

Dear Ms. Rolando:

Enclosed for filing pursuant to Docket No. 20-NOI-02 ICC Notice of Inquiry, is Mt. Carmel Public Utility Co.'s Entry of Appearance, along with its Response to Illinois Commerce Commission Notice of Inquiry. As directed in the Notice of Inquiry, we enclose three copies of each document: one for filing with your office, one for the Chicago Office, and one for the Office of the Chairman and Commissioners in Chicago.

We also enclose a copy to be file-marked and returned in the self-addressed, postage pre-paid envelope provided for your convenience. Thank you.

Very truly yours,
KOGER & BRAMLET, P.C.

Eric Bramlet

EB/mw
Enclosures
e-mail cy: jim.zolnierek@illinois.gov
w/ attachment

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	)	
On Its Motion	)	
	)	No. 20-NOI-02
Notice of Inquiry Regarding	)	
Electric and Natural Gas Service	)	
Safety and Reliability	)	

ENTRY OF APPEARANCE

Now comes Eric Bramlet of the law firm of Koger & Bramlet, P.C., and does hereby enter his appearance as attorney on behalf of Mt. Carmel Public Utility Co. in the above-captioned docket, and further enters his appearance for service of all notices and pleadings in the matters related to the proceedings.

Dated this 15th day of September, 2020.

MT. CARMEL PUBLIC UTILITY CO.

S / Eric Bramlet
Eric Bramlet, General Counsel

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STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	20-NOI-02
Notice of Inquiry Regarding	)	
Electric and Gas Service	)	
Safety and Reliability	)	

MT. CARMEL PUBLIC UTILITY CO. RESPONSE TO
ILLINOIS COMMERCE COMMISSION NOTICE OF INQUIRY

Now comes Mt. Carmel Public Utility Co., (hereinafter "MCPU") by and through its attorney, Eric Bramlet of Koger & Bramlet, P.C., and hereby submits it's response to the Illinois Commerce Commission's Notice of Inquiry Regarding Electric and Gas Safety and Reliability. The comments contained herein are an overview and do not contain specific detail for many, if not all of the questions. Time constraints did not allow for more detailed responses or comments. MCPU reserves the right to make additional and more detailed responses and comments as the Notice of Inquiry proceeds.

ELECTRIC

Public Utilities Section Questions and Answers:

A. *Please explain the process you use to inspect your utility plant, equipment, and property in order to ensure that utility service is provided in a safe and/or reliable manner. Please include detail on the types and quantities of plant, equipment and property inspected, and how frequently such plant, equipment, and property is examined.*

MCPU visually inspects its five substation locations weekly. During these inspections, counter and reading values for devices such as transformers, circuit breakers and DC battery supplies are recorded. Each substation is also thermally via drone inspected at least annually often along with other key components on the system. Each substation is tested every five years on a rotating testing cycle for each location. During these cyclical inspections all electrical components in the station are

examined, cleaned and electrically tested to ensure they operate within the manufacturers' specifications and the programmed settings.

MCPU's approximately 19.16 line miles of transmission facilities, 38.16 line miles of 9Kv Source of Supply facilities, 4.91 line miles of 69kv distribution facilities, and 256.88 line miles of 7.2Kv overhead distribution facilities and the associated line devices and materials are inspected yearly and as may be necessary following major storm events which may damage individual circuits or the system as a whole.

Line devices such as reclosers and voltage regulators are inspected quarterly with readings and counter information on these devices recorded at the time of inspection. Fleet trucks and equipment are inspected before each roll out, and aerial devices are di-electric tested annually. Personal Protective Equipment is also tested on a routine basis. Testing rotations recommended by the National Electric Safety Code are used as an outline by MCPU.

B. *Please explain how many workers currently perform such inspections, the average time spent in the field by each worker examining equipment and facilities, an estimate of the amount of utility plant, equipment, and property inspected annually by each worker, the qualifications of the workers performing such inspections, how workers are trained, how workers training is updated to include changes in requirements, and how the work performed by the workers is supervised.*

MCPU utilizes its electric construction and maintenance crews to perform inspections on its Transmission and Distribution facilities, substation locations and associated line devices. This force consists of eleven crew members. It is estimated that each involved employee spends approximately 66.11 hours annually examining facilities. MCPU estimates that, annually, each worker examines approximately 9.09 percent of the total plant, equipment and property involved.

Training for those involved in inspection programs is provided through apprenticeship classes, on the job training and department supervisor instruction. Employees assigned to specialized tasks, such as meter installation and testing, vegetation crews and other specialty employees are sent to outside training events developed around these tasks. As the company is made aware of changes in industry processes and requirements and equipment, these changes are incorporated into existing practices and those involved in inspection programs are updated as to those changes by the department supervisor or other company resource.

Inspection programs are supervised by the department supervisor, results of inspections are then reviewed by that supervisor for future action.

C. *Please explain whether your utility uses third parties to verify that inspections are performed timely and accurately and, if so, how such verifications are conducted.*

MCPU does not utilize third parties for this purpose.

D. *Please explain whether your utility uses third parties to perform inspections and, if so, how your company ensures that inspections are performed timely and accurately.*

MCPU uses third party providers to perform tasks such as annual thermal inspections of substations and cyclical substation testing and maintenance. These procedures are conducted on a recurring schedule and MCPU receives detailed reports from the providers following the completion of the work.

E. *Please explain how issues identified through inspections are addressed including how issues are prioritized and how potentially systemic issues are addressed.*

MCPU uses Circuit Inspection Forms to catalog issues or defects identified during circuit inspections. These issues or defects are weighted on a priority scale ranging from 1 to 3. "Priority 1" items are considered high priority and require immediate remedial action, "Priority 2" items are deemed moderate issues as are put into the work schedule for maintenance or repair, "Priority 3" items are considered low priority and are monitored for future repair or replacement. Systemic issues developing from inspections are reviewed by department supervisors and engineering personnel to determine the most practical and economical route to remediate the issue and maintain system reliability. Defects or issues identified during weekly substation inspections or quarterly reclosure and voltage regulator inspections are documented and reported to the department supervisor. Items of this nature are reviewed and the involved facility or component is repaired or replaced as necessary either with inside MCPU personnel or with third party contractors / vendors. Issues discovered in substation inspections by the third party contractors are addressed with minor corrections done by MCPU personnel and more significant issues addressed with outside contractors.

F. *Please explain whether your utility provides safety awareness to contractors and/or the public and, if so, please explain how this training or education is conducted.*

When MCPU does utilize outside contractors the parties are advised of current safety practices implemented by the company. MCPU provides safety awareness training to the public via supervisors and employees volunteering to make presentations at community safety awareness days as well as posting awareness ads on local radio and television outlets, social media pages and its website. Safety ads are often acquired from safeelectricity.org for use by MCPU.

G. *Please explain what processes you have in place to permit the public to report utility plant, equipment, and property that may pose a safety risk to the public, what formats are used (e.g., phone call, text messages, e-mails, website reports, etc.) what information is accepted through these processes (e.g., written reports, verbal reports,*

photographs, etc.) and the process and procedures you have in place to act upon such reports.

MCPU urges the public, through its safety awareness programs, to report any issue with utility facilities which they believe causes a safety risk or other hazard. MCPU accepts these types of reports via direct phone call to its business office, operations location or after hours dispatch service 24 hours a day. Reports of safety issues are also received through employees via their email, phone and text messages. MCPU also receives information about potential safety hazards from emergency services organizations during major events or as it may be relayed to them by the public.

Once received, MCPU inspects the location of the potential hazard and if MCPU facilities are involved, appropriate action is taken to resolve the issue based on the observed situation. If MCPU's facilities are not directly involved contact is made with the facility operator, if known, to inform that operator of the hazardous condition involving their facilities.

GAS

Public Utilities Section Questions and Answers:

A. *Please explain the processes you use to inspect your utility plant, equipment, and property in order to ensure that utility service is provided in a safe and/or reliable manner. Please include detail on the types and quantities of plant, equipment and property inspected, and how frequently such plant, equipment, and property is examined.*

MCPU inspects, maintains, and repairs equipment in compliance with manufacturer's recommended guidelines. Any tools or components are routinely inspected and repaired on a schedule that meets or exceeds the manufacturer's best practice. Any component or equipment that is of interest to organizations such as the ICC or PHMSA is also inspected and maintained on a schedule that reflects the guidelines put forth in official documentation from such agencies; Part 501, 191, 192, etc.

All construction equipment such as excavators, trenchers, directional boring machine, welders, trucks and trailers are cleaned and inspected after each workday, so any issues can be quickly identified and remedied before the next project begins.

Pipeline components (regulators and reliefs, meters, exposed segments of pipeline, valves, etc.) are inspected on a schedule that meets or exceeds the requirements put forth by the various regulatory agencies or by the manufacturer. Leak survey and patrolling of the system are also performed each year. One third of the entire system is surveyed using leak equipment each year, ensuring that every three years, every main and service line has been investigated with leak equipment. Patrolling of the system is done by vehicle every quarter. This patrol is done to survey any physical changes around the pipeline that could affect, or indicate an impact on the operability of the pipeline including, but not

limited to, ground subsidence, large patches of dead vegetation, excavation work near the system, and exposed sections of pipeline.

B. *Please explain how many workers currently perform such inspections, the average time spent in the field by each worker examining equipment and facilities, an estimate of the amount of utility plant, equipment, and property inspected annually by each worker, the qualifications of the workers performing such inspections, how workers are trained, how workers training is updated to include changes in requirements, and how the work performed by the workers is supervised.*

All of the gas department's field staff normally perform inspections on work equipment; excavators, trucks, tools, etc. daily, or as used. Inspections take place over a period of about 30 minutes to an hour each workday. Inspection of the items set forth in A. above are also performed by all gas department personnel who are Operator Qualified to do so. There is a field position at MCPU whose primary role is to oversee such inspections and maintenance throughout each year.

Field Employees are trained by both simulation of tasks and online training and field experience with oversight by an Operator Qualified individual. Our online training is compiled by a third party and is tailored to educate learners on the content of PHMSA Code of Federal Regulations Part 192 which prescribes natural gas safety guidelines and requirements. When changes are made to a section of Part 192, the learning is modified to reflect those changes. Employees also take part in outside courses to expand their practical knowledge, such as the Corrosion course at Purdue University hosted by NACE, as well as a leak survey course hosted by Southern Cross, and a gas metering school hosted by Honeywell.

C. *Please explain whether your utility uses third parties to verify that inspections are performed timely and accurately and, if so, how such verifications are conducted.*

MCPU uses a project management software program that tracks each component and verifies whether a specific component has been inspected within the required time constraint. This schedule is defined by MCPU and is user verified to ensure that every component is accounted for.

D. *Please explain whether your utility uses third parties to perform inspections and, if so, how your utility ensures that inspections are performed timely and accurately.*

MCPU does not hire or contract third parties to perform inspections on pipeline segments or components. Vehicles are taken to local mechanics who can thoroughly inspect and diagnose any problematic conditions with our fleet in need of repair. These inspections normally take place after employees have conducted their inspection and have noticed a probable issue. Specialized equipment, such as the horizontal directional drill, has periodic inspections completed by the manufacturer or an authorized service company on

the manufacturer's determined schedule. MCPU also contracts the service of a third-party to test and inspect our gas meter at the company's city gate station.

E. *Please explain how issues identified through inspections are addressed including how issues are prioritized and how potentially systematic issues are addressed.*

Each issue identified through these processes are immediately investigated for severity and how they affect functionality. Any issue that might affect safety is immediately rectified. Issues that may be cosmetic, or do not affect safety or functionality, may or may not be repaired, at least not immediately subject to cost and/or time constraints.

F. *Please explain whether your utility provides safety awareness training or education to contractors and/or the public and, if so, please explain how this training or education is conducted.*

MCPU hosts a yearly meeting, inviting local emergency agencies and responders to learn about the dangers of natural gas and how emergency situations are to be handled. MCPU also gives an informational booklet to each customer who signs up for service which details common materials used in home piping that may cause issues, as well as general safety tips such as characteristics of natural gas that can help identify if any issues exist. MCPU also sponsors a JULIE contractors meeting which focuses on utility safety and utility locating procedures for excavation projects.

G. *Please explain what processes you have in place to permit the public to report utility plant, equipment, and property that may pose a safety risk to the public, what formats are used (e.g., phone calls, text messages, e-mails, website reports, etc.) what information is accepted through these processes (e.g., written reports, verbal reports, photographs, etc.) and the processes and procedures you have in place to act upon such reports.*

Individuals in the general public may report any issues by phone. MCPU has 24-hour phone service available. During work hours, staff is always available to receive any phone calls. During after hours, MCPU contracts phone service and dispatch out to a third party. The process for the public to report issues remains unaffected, no matter the time of day. When a report is made, a supervisor is immediately contacted, a maintenance service order is created to inform a serviceman to respond to the issue, whether MCPU staff, or the third-party phone service receives the call. Safety issues are reported to supervisors regardless of the time of day to ensure that any issues reported are handled quickly and effectively.

<u>All Interested Persons Section Questions and Answers:</u>

A. *Please explain any changes that can be made to the Commission's rules and regulations to better ensure that electric and natural gas utility service is provided in a safe and/or reliable manner.*

MCPU has no suggestions at this time on what changes could be made to Commission's rules and regulations to ensure that electric and natural gas utility service is provided in a safe and/or reliable manner.

B. *Please explain any changes the public could make in their practices or procedures to better ensure that electric and natural gas utility service is provided in a safe and/or reliable manner.*

MCPU has no suggestions at this time on any changes that public could make in their practices or procedures to better ensure that electric and natural gas utility service is provided in a safe and/or reliable manner.

DATED September 15, 2020.

Respectfully Submitted,

MT. CARMEL PUBLIC UTILITY CO.

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